Frank D. Thompson, II (FT-0805) LONDON FISCHER LLP 59 Maiden Lane, 41st fl. New York, New York 10038 (212) 972-1000

Attorneys for Defendants: Milford Management Corp., Milstein Properties Corp., The Board of Managers of Liberty

Terrace Condominium

UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

21 MC 102 (AKH)

NURY IBANEZ,

Index No.: 07CV5296 :

Plaintiff,

-against-NOTICE OF ADOPTION TO MASTER COMPLAINT

MILFORD MANAGEMENT CORP., et al.,

Defendants.

PLEASE TAKE NOTICE that Defendants, MILFORD MANAGEMENT CORP., MILSTEIN PROPERTIES CORP., THE BOARD OF MANAGERS OF LIBERTY TERRACE CONDOMINIUM i/s/h/a LIBERTY TERRACE CONDOMINIUM, by their attorneys, LONDON FISCHER LLP, as and for their Response to the allegations set forth in the Complaint by Adoption (Check-Off Complaint) Related to the Master Complaint filed in the above-referenced action, hereby adopt their Answer to Master Complaint, dated August 3, 2007, which was filed in the matter of In Re World Trade Center Lower Manhattan Disaster Site Litigation, 21 MC 102 (AKH).

WHEREFORE, Defendants, MILFORD MANAGEMENT CORP., MILSTEIN PROPERTIES CORP., THE BOARD OF MANAGERS OF LIBERTY TERRACE CONDOMINIUM i/s/h/a LIBERTY TERRACE CONDOMINIUM, demand judgment dismissing the above-captioned action as against them, together with their costs and disbursements and for such other and further relief as this Court deems just and proper.

Dated: New York, New York September 14, 2007

LONDON FISCHER LLP

By:

Frank D Thompson II (FT-0805)

59 Maiden Lane

New York, New York 10038

(212) 972-1000

Attorneys for Defendants:
Milford Management Corp.
Milstein Properties Corp.
The Board of Managers of Liberty Terrace
Condominium

TO:

Battery Park City Authority c/o Wilson Elser, et al. 3 Gannett Drive White Plains, NY 10604

Robert J. Higgins Dickstein Shapiro Morin & Oshinsky LLP, 2101 L Street N.W. Washington, DC 20037

Lionshead 110 Development, LLC Eschen, Frenkle & Weisman, LLP 20 West Main Street Bayshore, NY 11706

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CERTIFICATION OF SERVICE

I hereby certify that I caused a true copy of the Notice of Adoption of Answer to Master Complaint to be served via First Class Mail on the day of September 14, 2007, upon the following:

Document 11

Battery Park City Authority c/o Wilson Elser, et al. 3 Gannett Drive White Plains, NY 10604

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The undersigned further certifies that on September 14, 2007, I caused the Notice of Adoption of Answer to Master Complaint to be electronically via the Court's ECF System upon the following:

ALL DEFENSE COUNSEL

Dated: September 14, 2007

Frank D. Thompson, II